SHILOH CAPITAL

PRIVATE INVESTMENT · STRATEGIC ADVISORY · M&A

GOVERNANCE & COMPLIANCE POLICY DOCUMENTATION

PAIA Manual

The manual of Shiloh Capital, prepared in terms of section 51 of the Promotion of Access to Information Act, serving as the Firm's access-to-information policy and describing the records it holds, the procedure for requesting access, and the rights and remedies of requesters under PAIA and the Protection of Personal Information Act.

DOCUMENT REFERENCE	VERSION	DOCUMENT OWNER	APPROVED BY
SC-PAIA-MAN-001	**1.0 — June 2026**	**Information Officer & Compliance Function**	**Founding Directors**
REVIEW FREQUENCY	**NEXT REVIEW DATE**	**FSP AUTHORITY**	**SUPERVISORY REGULATOR**
Annual	**June 2027**	**FyreFem Fund Managers — FSP No. 49359**	**Information Regulator (SA) & FSCA**

PAIA 2/2000 | POPIA 4/2013 | CONSTITUTION S32 | FAIS 37/2002 | FICA 38/2001 | ECTA 25/2002 | COMPANIES ACT 71/2008 | KING V — PRINCIPLE 13 | ISO 9001:2015

MANUAL CONTENTS

SECTION 01

Purpose & Introduction

1.1 Purpose of this Manual

This manual ("the Manual" or "SC-PAIA-MAN-001") is the manual of Shiloh Capital (Pty) Limited and its affiliated entities (collectively "Shiloh Capital", "the Firm", "we", "us", or "our"), compiled and published in terms of section 51 of the Promotion of Access to Information Act, 2 of 2000 ("PAIA"). It gives effect to the constitutional right of access to information held by private bodies enshrined in section 32 of the Constitution of the Republic of South Africa, 1996.

The Manual is intended to assist any person who wishes to request access to a record held by the Firm. It describes the Firm's particulars, the records it holds, the procedure to be followed in making a request for access, the fees that may be payable, the grounds on which access may be refused, and the remedies available to a requester who is dissatisfied with the Firm's response.

1.2 Status & Application

The Firm is a "private body" as defined in PAIA. As a participant in the financial services sector, operating as a Juristic Representative of FyreFem Fund Managers (Pty) Ltd (FSP No. 49359), the Firm holds records relating to its clients, investors, counterparties, employees, and operations. This Manual applies to all such records, in whatever form they are held.

This Manual is published on the Firm's website for public review and is read together with the Firm's Privacy Policy (SC-POL-PRV-001), which governs the processing and protection of personal information under the Protection of Personal Information Act, 4 of 2013 ("POPIA").

1.3 Definitions

Words and expressions used in this Manual bear the meanings ascribed to them in PAIA and POPIA. In particular, a "requester" is any person making a request for access to a record; a "personal requester" is a requester seeking access to a record that contains their own personal information; and a "record" means any recorded information in the possession or under the control of the Firm, regardless of form or medium.

SECTION 02

Legislative & Regulatory Framework

This Manual has been prepared with reference to, and is intended to comply with, the access-to-information, data protection, and financial services legislation applicable to the Firm in the Republic of South Africa.

FRAMEWORK	RELEVANCE TO THIS MANUAL
Promotion of Access to Information Act, 2 of 2000 (PAIA)	The primary statute giving effect to the right of access to information. Section 51 requires a private body to compile this Manual; sections 50 to 53 govern the right of and procedure for access to records held by private bodies.
Constitution of the Republic of South Africa, 1996	Section 32 guarantees everyone the right of access to information held by another person that is required for the exercise or protection of any right. PAIA gives effect to this right.
Protection of Personal Information Act, 4 of 2013 (POPIA)	Governs the processing of personal information and confers on data subjects the right of access to, and correction or deletion of, their personal information. Such requests are made through the PAIA process.
FAIS Act, 37 of 2002	Requires the protection and confidentiality of client information and the maintenance of records in the rendering of financial services, informing the records the Firm holds.
FICA, 38 of 2001	Requires the collection, verification, and retention of client identification and due diligence records for the prevention of money laundering and terrorist financing.
Companies Act, 71 of 2008	Requires the Firm to maintain statutory records of its securities, directors, and prescribed officers, and governs the retention of company records.
ECTA, 25 of 2002	Recognises the validity of electronic records and communications and governs the electronic submission of requests.
King V & Companies Act	King V Principle 13 requires the governing body to govern compliance with applicable laws, including PAIA and POPIA, supported by this Manual.

SECTION 03

Particulars of the Private Body

The particulars of the Firm, as required by section 51(1)(a) of PAIA, are set out below.

Registered Name	Shiloh Capital (Pty) Limited
Registration Number	2015/426355/07
Nature of Business	Transaction advisory, capital raising, and mergers and acquisitions services
Regulatory Status	Juristic Representative of FyreFem Fund Managers (Pty) Ltd, an authorised financial services provider (FSP No. 49359) regulated by the Financial Sector Conduct Authority
Registered & Postal Address	Office 212, Max Office Park, 145 Second Street, Parkmore, Sandton, 2196
Telephone	+27 (0) 10 109 0787
Website	shilohcap.com
Head of the Private Body	The Managing Director, in the capacity of Information Officer
Group Entities	Shiloh Capital Business Solution (Pty) Ltd; Shiloh Capital Private Markets (Pty) Ltd; Shiloh Capital Risk Solutions (Pty) Ltd

This Manual covers the records of the Firm and, to the extent applicable, the records of the group entities listed above that are held under the Firm's control. Requests for access to records must be directed to the Information Officer at the contact details set out in Section 17.

SECTION 04

Information Officer & Deputies

4.1 The Information Officer

In accordance with PAIA and section 56 of POPIA, the Information Officer of the Firm is the head of the Firm, being the Managing Director. The Information Officer is registered with the Information Regulator and is responsible for the Firm's compliance with PAIA and POPIA, including the handling of requests for access to records and the maintenance of this Manual.

4.2 Deputy Information Officer

The Information Officer has designated a Deputy Information Officer, being the Compliance Officer, to render the Firm as accessible as reasonably possible to requesters and to assist in the discharge of the duties under PAIA and POPIA. Requests and queries may be directed to the Deputy Information Officer in the first instance.

4.3 Functions in Respect of Access Requests

- Receiving and processing requests for access to records made under PAIA;
- Deciding whether access to a record is to be granted, deferred, or refused in accordance with the Act;
- Notifying third parties where a requested record contains information relating to them;
- Determining and notifying the requester of applicable request and access fees and any deposit;
- Notifying the requester of the decision and of the available remedies; and
- Maintaining this Manual and ensuring its availability to the public.

The contact details of the Information Officer and Deputy Information Officer, to whom all requests must be addressed, are set out in Section 17 of this Manual.

SECTION 05

The Regulator's Guide on PAIA

In terms of section 10 of PAIA, the Information Regulator has compiled a guide containing such information, in an accessible form, as may reasonably be required by a person who wishes to exercise any right contemplated in PAIA and POPIA. The Guide is available in each of the official languages of the Republic.

5.1 Contents of the Guide

The Guide contains, among other things, a description of the objects of PAIA and POPIA; the particulars of the bodies and officers responsible for their administration; the manner and form of a request for access to a record; the assistance available from an Information Officer and from the Information Regulator; the remedies available in law to a person aggrieved by an act or failure to act in relation to the exercise of a right; and the provisions requiring private bodies to compile a manual.

5.2 How to Obtain the Guide

The Guide may be obtained, free of charge, from the Information Regulator. Copies are available on the Information Regulator's website and on request from its offices, at the contact details set out in Section 17 of this Manual.

ASSISTANCE TO REQUESTERS

The Firm will assist a person who needs help to make a request.

Where a requester is unable to read or write, or has a disability, or otherwise requires assistance to make a request for access, the Information Officer or Deputy Information Officer will take reasonable steps to assist that person to make the request in a manner that gives effect to their right of access under PAIA.

SECTION 06

Records Automatically Available

6.1 Notice under Section 52

Section 52 of PAIA permits the head of a private body to publish a notice in the Gazette describing categories of records that are automatically available without a person having to lodge a formal request for access. The Firm has not published a notice in terms of section 52(2) of PAIA.

6.2 Records Voluntarily Made Available

Notwithstanding the absence of a section 52 notice, the Firm voluntarily makes the following categories of records available to the public, free of charge, without the need for a formal PAIA request:

- The Firm's corporate profile, service descriptions, and marketing materials published on its website;
- This PAIA Manual (SC-PAIA-MAN-001) and the Firm's Privacy Policy (SC-POL-PRV-001);
- Information that the Firm has elected to make publicly available or is required by law to publish; and
- Any record that a data subject is entitled to access in respect of their own personal information, subject to the procedure in Section 15.

All other records held by the Firm are available only on submission of a request for access in accordance with the procedure set out in Section 10, and subject to the grounds for refusal in Section 12.

SECTION 07

Categories of Records Held

In accordance with section 51(1)(e) of PAIA, the subjects and categories of records held by the Firm are described below. The description is provided to facilitate requests and is not an exhaustive list, nor does its inclusion mean that a record will necessarily be accessible.

SUBJECT / CATEGORY	DESCRIPTION OF RECORDS
Statutory & Corporate Records	Memorandum of Incorporation, registers of directors and securities, board and committee minutes and resolutions, and statutory filings.
Client & Transaction Records	Mandates, engagement letters, advisory and transaction documentation, correspondence, and deal files.
Due Diligence & Compliance Records	FICA and FAIS onboarding records, verification documents, screening results, and regulatory compliance records.
Financial & Accounting Records	Annual financial statements, management accounts, invoices, banking records, and tax records.
Employment & Human Resource Records	Employment contracts, personnel files, payroll records, and records required by labour and tax legislation.
Marketing & Website Records	Corporate profile, published materials, website content, and analytics data.
Supplier & Service Provider Records	Contracts with operators, service providers, and professional advisers, and related correspondence.
Personal Information Records	Personal information processed by the Firm as a responsible party, as described in the Privacy Policy and Section 09 of this Manual.

SECTION 08

Records Held under Other Legislation

The Firm holds and maintains records in accordance with, among others, the following legislation. The reference to a statute below does not mean that the records are accessible, but is provided to assist a requester in identifying the records the Firm is required by law to keep.

LEGISLATION	NATURE OF RECORDS
Companies Act, 71 of 2008	Statutory and corporate records.
FAIS Act, 37 of 2002	Client, advice, and transaction records.
FICA, 38 of 2001	Identification, verification, and due diligence records.
Income Tax Act, 58 of 1962 & Tax Administration Act, 28 of 2011	Tax and supporting financial records.
Value-Added Tax Act, 89 of 1991	VAT records, where applicable.
Basic Conditions of Employment Act, 75 of 1997	Employment and working-time records.
Labour Relations Act, 66 of 1995	Records relating to labour relations and dispute resolution.
Employment Equity Act, 55 of 1998	Employment equity records, where applicable.
Unemployment Insurance Act, 63 of 2001 & Skills Development Levies Act, 9 of 1999	UIF and SDL records.
Compensation for Occupational Injuries and Diseases Act, 130 of 1993	COIDA records, where applicable.
Protection of Personal Information Act, 4 of 2013	Records relating to the processing of personal information.

SECTION 09

Records on the Processing of Information

This section is included in accordance with the requirements introduced into PAIA by POPIA, and describes the personal information processed by the Firm as a responsible party. Further detail is set out in the Firm's Privacy Policy (SC-POL-PRV-001).

9.1 Categories of Data Subjects

- Prospective, current, and former clients, investors, and counterparties, and their representatives and beneficial owners;
- Employees, directors, Key Individuals, representatives, job applicants, and contractors; and
- Suppliers, service providers, and professional advisers.

9.2 Purpose of Processing

Personal information is processed for the rendering of advisory and intermediary services; client onboarding, identity verification, and due diligence; communication and relationship management; record-keeping, audit, accounting, and tax compliance; the management of employment relationships; and compliance with the Firm's legal and regulatory obligations.

9.3 Recipients & Security

Personal information may be disclosed to operators, professional advisers, counterparties, and regulators, as described in the Privacy Policy, and is secured by appropriate, reasonable technical and organisational measures in accordance with section 19 of POPIA. Cross-border transfers, where they occur, are made only on a basis permitted by section 72 of POPIA.

SECTION 10

How to Request Access to a Record

10.1 The Prescribed Request Form

A request for access to a record held by the Firm must be made on the prescribed form (Form 2 — Request for Access to Record of Private Body), which is available on the Information Regulator's website and from the Information Officer on request. The completed form must be submitted to the Information Officer at the contact details in Section 17, by hand, post, or email.

10.2 Information to be Provided

To enable the Firm to identify and process the request, the requester must:

- Provide sufficient particulars to enable the Information Officer to identify the record and the requester;
- Indicate the form of access required and, if applicable, the manner in which they wish to be informed of the decision;
- Identify the right that the requester seeks to exercise or protect; and
- Explain why the requested record is required for the exercise or protection of that right.

Where a request is made on behalf of another person, the requester must submit proof of the capacity in which they are making the request, to the satisfaction of the Information Officer.

10.3 Personal Requesters

A personal requester (a requester seeking access to a record containing their own personal information) is not required to pay a request fee. All other requesters must pay the prescribed request fee before the request is further processed, as set out in Section 13.

SECTION 11

Processing of Requests & Decision Periods

11.1 Decision Period

The Information Officer will decide on a request for access and notify the requester of the decision as soon as reasonably possible, but in any event within 30 days after the request has been received. The period within which the Firm must respond does not begin until all required particulars and any applicable request fee have been provided.

11.2 Extension

The Information Officer may extend the 30-day period once, by a further period of not more than 30 days, where the request is for a large number of records, requires a search through a large number of records, or where consultation with third parties cannot reasonably be completed within the original period. The requester will be notified of any extension and the reasons for it.

11.3 Third Party Notification

Where a requested record contains information about a third party, the Information Officer will, where required by PAIA, notify that third party and afford them the opportunity to make representations or to consent to disclosure before a decision is taken.

11.4 Deposits & Deferral

Where the search for and preparation of a record is likely to require more than the prescribed hours, the Information Officer may require the payment of a deposit of not more than one third of the access fee that would be payable if the request were granted. Where access is granted but the record will be available only at a later date, the Firm may defer access and notify the requester accordingly.

SECTION 12

Grounds for Refusal of Access

The Firm may, and in certain cases must, refuse a request for access to a record on the grounds set out in Chapter 4 of Part 3 of PAIA. The principal grounds are summarised below.

GROUND (PAIA SECTION)	DESCRIPTION
Privacy of a Third Party (s63)	Mandatory protection of the personal information of a third party natural person where disclosure would be unreasonable.
Commercial Information of a Third Party (s64)	Protection of trade secrets, financial, commercial, scientific, or technical information of a third party that could harm their interests.
Confidential Information (s65)	Protection of information supplied in confidence, the disclosure of which could breach a duty of confidence owed to a third party.
Safety & Property (s66)	Protection of records the disclosure of which could endanger the life or physical safety of an individual or prejudice the security of property.
Legal Privilege (s67)	Protection of records that are privileged from production in legal proceedings.
Commercial Information of the Firm (s68)	Protection of the Firm's own trade secrets and commercial, financial, and technical information.
Research Information (s69)	Protection of research information of a third party or of the Firm where disclosure could expose them to serious disadvantage.
Public Interest Override (s70)	Despite a ground for refusal, access must be granted where disclosure would reveal a substantial contravention of law or an imminent and serious public safety or environmental risk, and the public interest in disclosure clearly outweighs the harm.

SECTION 13

Prescribed Fees

Two types of fee may be payable in respect of a request for access to a record of a private body, as prescribed in the Regulations made under PAIA: a request fee and an access fee. The amounts set out below reflect the fees prescribed under the Regulations and are subject to amendment; value-added tax may be added where applicable.

FEE TYPE	AMOUNT
Request fee (requester other than a personal requester)	R50.00, payable on submission before the request is further processed.
Request fee (personal requester)	No request fee payable.
Reproduction of records (per copy or page)	At the rates prescribed in the PAIA Regulations for photocopies, printed copies, transcriptions, and copies in computer-readable form.
Search and preparation	At the prescribed rate for each hour reasonably required, excluding the first hour, to search for and prepare the record for disclosure.
Postage	The actual postal fee, where a copy is to be posted to the requester.
Deposit	Where applicable, up to one third of the access fee that would be payable if the request were granted.

The Information Officer will notify the requester of the applicable fees and any deposit before processing the request further. A record will not be released until the applicable fees have been paid in full. A requester may lodge a complaint with the Information Regulator or apply to a court against the tender or payment of a request fee or deposit.

SECTION 14

Remedies Available to Requesters

14.1 No Internal Appeal against a Private Body

PAIA does not provide for an internal appeal against a decision of the head of a private body. A requester who is dissatisfied with a decision of the Firm in relation to a request for access may pursue the external remedies described below.

14.2 Complaint to the Information Regulator

A requester may lodge a complaint with the Information Regulator, in the prescribed manner and form, where they are aggrieved by a decision of the Firm in relation to a request for access, the refusal of a request, the fees payable, or the form of access granted. A complaint must be lodged within 180 days of the relevant decision, unless the Regulator condones a late submission. The contact details of the Information Regulator are set out in Section 17.

14.3 Application to Court

A requester may, in addition or as an alternative, apply to a court for appropriate relief under section 78 of PAIA, within 180 days of the relevant decision, or within 180 days after a decision of the Information Regulator on a complaint. The court may grant such order as is just and equitable, including an order for the disclosure of the record.

FIRST POINT OF CONTACT

We encourage requesters to engage the Information Officer directly.

Many queries can be resolved without resort to a complaint or court application. A requester who is uncertain about the status of a request, or who wishes to discuss the Firm's decision, is encouraged to contact the Information Officer at the details in Section 17 in the first instance.

SECTION 15

Personal Information Requests (POPIA)

A data subject has rights in respect of their own personal information under POPIA, which are exercised through the procedures described below and, where access is sought, through the PAIA request process.

15.1 Access to Personal Information

In terms of section 23 of POPIA, a data subject may request confirmation of whether the Firm holds personal information about them, and a record or description of that information. A request for access is made through the PAIA process described in Section 10. No fee is payable for confirmation of whether the Firm holds personal information; a prescribed fee may apply to the provision of a record or description.

15.2 Correction or Deletion

In terms of section 24 of POPIA, a data subject may request the Firm to correct or delete personal information that is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully, or to destroy or delete a record the Firm is no longer authorised to retain. Such a request is made on the prescribed form and directed to the Information Officer.

15.3 Objection to Processing

In terms of section 11(3) of POPIA, a data subject may object, on reasonable grounds, to the processing of their personal information, on the prescribed form. Where a valid objection is received, the Firm will no longer process the relevant personal information, save where the processing is permitted or required by law.

15.4 Prescribed Forms

The prescribed POPIA forms for objection to processing and for the correction or deletion of personal information are available from the Information Officer and on the Information Regulator's website.

SECTION 16

Availability & Updating of the Manual

16.1 Availability

In accordance with PAIA and its Regulations, this Manual is made available:

- On the Firm's website, free of charge, for public review and download;
- At the registered offices of the Firm, for inspection during normal business hours;
- To any person, on request to the Information Officer, against payment of the prescribed photocopying fee where a copy is required; and
- To the Information Regulator, as required.

16.2 Updating of the Manual

The Firm reviews this Manual at least annually, and updates it as and when necessary to reflect changes in the Firm's records, structure, contact details, or the applicable law. The version number and effective date of the current Manual appear in the document control section.

16.3 Languages

This Manual is published in English. A requester who requires assistance in another official language may contact the Information Officer, who will take reasonable steps to assist.

SECTION 17

Contact Details & the Regulator

All requests for access to records, and all queries regarding this Manual, must be directed to the Information Officer at the details below.

SHILOH CAPITAL — INFORMATION OFFICER

Attention: The Information Officer (Office of the Managing Director), supported by the Deputy Information Officer (Compliance Function)

Address: Office 212, Max Office Park, 145 Second Street, Parkmore, Sandton, 2196

Telephone: +27 (0) 10 109 0787

Email: lmukuwane@shilohcap.com

Website: shilohcap.com

A requester who is dissatisfied with the Firm's handling of a request, or who wishes to obtain the section 10 Guide, may contact the Information Regulator.

THE INFORMATION REGULATOR (SOUTH AFRICA)

Physical: JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001

Postal: P.O. Box 31533, Braamfontein, Johannesburg, 2017

Telephone: 010 023 5200 | Toll-free: 0800 017 160

General enquiries: enquiries@inforegulator.org.za

PAIA complaints: PAIAComplaints@inforegulator.org.za

POPIA complaints: POPIAComplaints@inforegulator.org.za

Website: inforegulator.org.za

The prescribed PAIA and POPIA forms referred to in this Manual are available on the Information Regulator's website at inforegulator.org.za.

SECTION 18

Document Control & Approval

18.1 Related Documents

DOCUMENT REF	TITLE & RELATIONSHIP TO THIS MANUAL
SC-POL-PRV-001	Privacy Policy — processing and protection of personal information under POPIA.
SC-POL-COI-001	Conflicts of Interest Policy — management of conflicts in the handling of information.
SC-POL-RMP-001	Risk Management Policy — information and conduct risk.
SC-QMS-MAN-001	ISO 9001:2015 Quality Manual — records and information controls.

18.2 Document Control

Document Title	Shiloh Capital PAIA Manual
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